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and the Proposed Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

*Individual and Representative Plaintiffs,*

v.

META PLATFORMS, INC.,

*Defendant.*

CASE NO. 3:23-cv-03417-VC

**DECLARATION OF JOSHUA M. STEIN  
IN SUPPORT OF PLAINTIFFS' REPLY  
RE MOTION FOR LEAVE TO FILE  
THIRD AMENDED CONSOLIDATED  
COMPLAINT**

I, Joshua M. Stein, declare as follows:

I am an attorney duly licensed to practice in the State of California. I am a partner in the San Francisco, California office of Boies Schiller Flexner, LLP (“BSF”), counsel for Plaintiffs in the above-captioned action. I have personal knowledge of the matters stated herein and if called upon, I can competently testify thereto. I make this declaration pursuant to 28 U.S.C. Section 1746 and Local Rule 6-3 in support of Plaintiffs’ Reply to Defendant Meta Platform, Inc.’s (“Meta’s”) Opposition to Plaintiffs’ Motion for Leave to File a Third Amended Consolidated Complaint (the “Reply”).

1. Attached to this Declaration as Exhibit A is a true and correct copy of a document produced by Meta bearing the Bates range Meta\_Kadrey\_211699 - Meta\_Kadrey\_211703.

2. Attached to this Declaration as Exhibit B is a true and correct copy of a document produced by Meta bearing the Bates range Meta\_Kadrey\_204223 - Meta\_Kadrey\_204224.

3. Attached to this Declaration as Exhibit C is a true and correct copy of a document produced by Meta bearing the Bates range Meta\_Kadrey\_204218 - Meta\_Kadrey\_204222.

4. Attached to this Declaration as Exhibit D is a true and correct copy of a document produced by Meta bearing the Bates Number Meta\_Kadrey\_211852.

5. Attached to this Declaration as Exhibit E are selected rough transcript excerpts from the December 17, 2024 deposition of Mark Zuckerberg.

6. Attached to this Declaration as Exhibit F are selected transcript excerpts from the September 19, 2024 deposition of Todor Mihaylov.

7. Attached to this Declaration as Exhibit G are selected transcript excerpts from the November 20, 2024 Rule 30(b)(6) deposition of Michael Clark.

8. Attached to this Declaration as Exhibit H are excerpts from Meta’s Objections and Responses to Plaintiffs’ Fifth Set of Requests for Production.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 18th day of December 2024 in San Francisco, California.

By: /s/ Joshua M. Stein  
Joshua M. Stein